

Exhibit 4



Confira lista de denunciados pelo MPF e entenda os crimes praticados

Globo Online (Brazil)

July 6, 2009 Monday

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Length: 921 words

Byline: O Globo

Body

RIO - Confira abaixo a lista dos 14 integrantes do grupo Opportunity denunciados pelo Ministério Público Federal (MPF), em São Paulo, à 6ª Vara Federal Criminal. Entenda também os sete crimes praticados pelo grupo e detalhados na denúncia.

- 1) Daniel Valente Dantas, controlador do grupo Opportunity: já foi condenado a uma pena de 10 anos de prisão em processo de corrupção ativa e foi denunciado agora pelo MPF sob as acusações de crimes de quadrilha e organização criminosa, gestão fraudulenta de instituição financeira, evasão de divisas e lavagem de dinheiro;
- 2) Verônica Valente Dantas, sócia, diretora e conselheira de várias empresas do grupo e do banco: quadrilha e organização criminosa, gestão fraudulenta de instituição financeira, evasão de divisas e lavagem de dinheiro;
- 3) Dório Ferman, presidente do banco Opportunity: quadrilha e organização criminosa, gestão fraudulenta de instituição financeira, gestão temerária de instituição financeira, evasão de divisas e lavagem de dinheiro;
- 4) Itamar Benigno Filho, diretor do banco: gestão temerária de instituição financeira e participação no crime de gestão fraudulenta de instituição financeira;
- 5) Danielle Silbergleid Ninnio, da área jurídica do grupo, ex-assessora jurídica da Brasil Telecom: crime de quadrilha e organização criminosa;
- 6) Norberto Aguiar Tomaz, diretor do banco: lavagem de dinheiro;
- 7) Eduardo Penido Monteiro, diretor do banco: lavagem de dinheiro;
- 8) Rodrigo Bhering Andrade, diretor de empresas ligadas ao grupo: participação no crime de gestão fraudulenta de instituição financeira;
- 9) Maria Amália Delfim de Melo Coutrim, conselheira de diversas empresas do grupo: participação no crime de gestão fraudulenta de instituição financeira;
- 10) Humberto José Rocha Braz, ex-diretor da Brasil Telecom e atual consultor do grupo Opportunity: já foi condenado a sete anos de prisão em processo pelo crime de corrupção ativa. Desta vez é denunciado pelo MPF sob as acusações de crimes de quadrilha e organização criminosa e duas lavagens de dinheiro;
- 11) Carla Cicco, ex-presidente da Brasil Telecom: participação no crime de gestão fraudulenta de instituição financeira;

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- 12) Guilherme Henrique Sodré Martins, o Guiga, lobista do Opportunity: quadrilha e organização criminosa;
- 13) Roberto Figueiredo do Amaral, lobista e consultor: crime de quadrilha e organização criminosa e lavagem de dinheiro;
- 14) William Yu, consultor financeiro: crime de quadrilha e organização criminosa e lavagem de dinheiro.

Conheça a síntese dos sete fatos criminosos da denúncia do MPF

- 1) Crime de quadrilha e organização criminosa: Dantas e os acusados pelo crime de quadrilha associaram-se de forma permanente e estável desde 1999 para reiteradamente cometerem crimes de gestão fraudulenta, evasão de divisas, lavagem de dinheiro e corrupção ativa, o que configura ainda organização criminosa, de acordo com a Convenção de Palermo, da ONU, contra o crime organizado, ratificada pelo Brasil;
- 2) Gestão fraudulenta: Dantas, Verônica e Ferman cometeram, segundo a denúncia, fraudes no comando do Opportunity Fund e do banco Opportunity. Há diversas fraudes: a presença de cotistas brasileiros no fundo, quando a prática era proibida; desvio de recursos da Brasil Telecom para autofinanciamento do Opportunity; utilização da Brasil Telecom para repassar recursos às empresas de publicidade de Marcos Valério, figura central do Mensalão, com as quais foram firmados dois contratos, superiores a R\$ 50 milhões; presença de funcionários do grupo Opportunity na folha de pagamento da BrT; uso de dinheiro da BrT para a aquisição de aviões usados pelo Opportunity por meio de consórcio, aluguel de R\$ 44 mil mensais e reforma de mais de R\$ 2 milhões de dois andares comerciais para escritório da BrT em São Paulo, usados, na prática, pelo Opportunity. Tais fraudes contaram com o apoio material de Benigno, Carla Cicco, Bhering e Maria Amalia;
- 3) Gestão temerária: Ferman e Benigno, a frente do banco Opportunity, entre 2005 e 2006, desrespeitaram regras do Banco Central quanto à informação aos órgãos competentes de casos em que havia a suspeita de crimes previstos na lei de combate à lavagem de dinheiro. Tal irregularidade foi detectada pelo BC e configura crime de gestão temerária;
- 4) Evasão de divisas: entre 1998 e 2004, ao permitirem que cotistas brasileiros investissem no Opportunity Fund, o que era vedado, Dantas, Ferman e Verônica, como gestores do fundo, proporcionaram que tais cotistas e as próprias empresas do Opportunity mantivessem recursos do exterior de forma ilegal, o que configura evasão;
- 5) Lavagem de dinheiro: Ao ocultar recursos próprios e de terceiros, oriundos de crimes contra o sistema financeiro nacional, por intermédio do Opportunity Fund e do **Opportunity Unique Fund**, entre 2005 e o presente, Dantas, Ferman, Verônica, Aguiar e Penido cometeram o crime de lavagem de dinheiro;
- 6) Lavagem de dinheiro: Entre novembro de 2007 e junho de 2008, Humberto Braz dissimulou recursos criminosos por meio de um complexo sistema de fictícios pagamentos de consultoria à empresa Igbraz. Esse pode ter sido o sistema usado para dissimular a transferência de recursos do grupo para a propina apreendida pela Polícia Federal com a qual o grupo criminoso assediou os policiais federais que investigavam o caso;
- 7) Lavagem de dinheiro: Entre agosto de 2006 e 2007, Braz, Yu e Amaral, montaram outro esquema de lavagem de dinheiro, envolvendo duas offshores e a empresa de fachada MB2 Consultoria Empresarial. © NotíciasFinancieras - © GDA- Agencia Globo - All rights reserved

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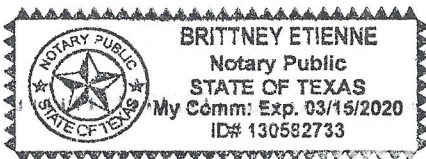
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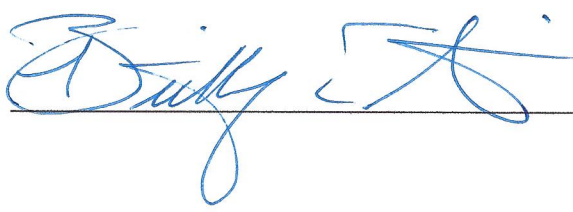
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Before me, a Notary Public, on this day personally appeared Flor Dimassi
to me, a person whose name is subscribed in the foregoing document and, being by me first duly sworn, declared the statements contained herein were true and correct. SUBSCRIBED AND SWORN TO before me the undersigned authority on this 19th day of October, 2018 in Houston, Harris County, Texas to certify which witness my hand and seal of Office.





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See the list of people prosecuted by the Federal Prosecution Office and the crimes committed

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RIO - See below the list of the 14 members of the Opportunity group prosecuted by the Federal Prosecution Office (FPO) in São Paulo, at the 6th Federal Criminal District. Understand the seven crimes committed by the group and detailed in the accusation.

- 1) Daniel Valente Dantas, controller of the Opportunity group: already sentenced to 10 years in prison in an active corruption lawsuit and now accused by the FPO of criminal conspiracy and creation of a criminal organization, fraudulent management of a financial institution, tax evasion and money laundering;
- 2) Verônica Valente Dantas, partner, director and member of the board of several companies of the group and of the bank: criminal conspiracy and creation of a criminal organization, fraudulent management of a financial institution, tax evasion and money laundering;
- 3) Dório Ferman, president of the Opportunity bank: criminal conspiracy and creation of a criminal organization, fraudulent management of a financial institution, negligent management of a financial institution, tax evasion and money laundering;
- 4) Itamar Benigno Filho, director of the bank: negligent management of a financial institution and participation in the crime of fraudulent management of a financial institution;
- 5) Danielle Silbergleid Ninnio, of the judicial section of the group, former legal aide of Brasil Telecom: criminal conspiracy and creation of a criminal organization;
- 6) Norberto Aguiar Tomaz, director of the bank: money laundering;
- 7) Eduardo Penido Monteiro, director of the bank: money laundering;
- 8) Rodrigo Bhering Andrade, director of companies connected to the group: participation in the crime of fraudulent management of a financial institution;
- 9) Maria Amália Delfim de Melo Coutrim, member of the board of several companies in the group: participation in the crime of fraudulent management of a financial institution;
- 10) Humberto José Rocha Braz, former director of Brasil Telecom and current consultant of the Opportunity group: has been sentenced to seven years in prison in a lawsuit for the crime of active corruption. This time, he's been accused by the FPO of the crimes of criminal conspiracy and creation of a criminal organization and two counts of money laundering;
- 11) Carla Cicco, former president of Brasil Telecom: participation in the crime of fraudulent management of a financial institution;

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See the list of people prosecuted by the Federal Prosecution Office and the crimes committed

- 12) Guilherme Henrique Sodré Martins, also known as Guiga, lobbyist of Opportunity: criminal conspiracy and creation of a criminal organization;
- 13) Roberto Figueiredo do Amaral, lobbyist and consultant: criminal conspiracy and creation of a criminal organization and money laundering;
- 14) William Yu, financial consultant: criminal conspiracy and creation of a criminal organization and money laundering.

Listed below is a summary of the seven criminal acts within the FPO accusation.

- 1) Criminal conspiracy and creation of a criminal organization: Dantas and those accused of criminal conspiracy associated with a continuous and organized process since 1999 of repeatedly committing crimes of fraudulent management, tax evasion, money laundering and active corruption, which also constitutes the creation of a criminal organization, per the Palermo Convention of the UN against organized crime, ratified by Brazil;
- 2) Fraudulent management: Dantas, Verônica and Ferman committed, according to the accusation, frauds in the command of the Opportunity Fund and of the Opportunity Bank. There are several counts of fraud: the presence of Brazilian shareholders in the fund, when the practice was forbidden; embezzlement of resources of Brazil Telecom to the self-financing of Opportunity; use of Brazil Telecom to pass resources to the publicity companies of Marcos Valério, a central figure in the *Mensalão*, with which two contracts were signed, worth over R\$ 50 million; the presence of employees of the Opportunity group on the BrT payroll; use of BrT money for acquiring airplanes used by Opportunity through a consortium; rent of R\$ 44 thousand per month and over R\$ 2 million of two commercial floors for a BrT office in São Paulo, used, in practice, by Opportunity. Said frauds had the material support of Benigno, Carla Cicco, Bhering and Maria Amalia;
- 3) Negligent management: Ferman and Benigno, running the Opportunity bank, between 2005 and 2006, disrespected rules of the Central Bank about the information to the competent bodies of cases in which there was a suspicion of crimes foreseen in the law for fighting money laundering. Said irregularity was detected by the Central Bank and is defined as a crime of negligent management;
- 4) Tax evasion: between 1998 and 2004, in allowing Brazilian shareholders to invest into the Opportunity Fund, which was forbidden, Dantas, Ferman and Verônica, as managers of the fund, allowed said shareholders and the Opportunity companies themselves to keep resources from abroad illegally, which is defined as tax evasion;
- 5) Money laundering: Upon hiding their own resources and those of third parties, stemming from crimes against the national financial system, through the Opportunity Fund and the Opportunity Unique Fund, between 2005 and the current date, Dantas, Ferman, Verônica, Aguiar and Penido committed the crime of money laundering;
- 6) Money laundering: Between November, 2007 and June, 2008, Humberto Braz disguised criminal resources through a complex system of fictitious consultancy payments to the Igbraz company. That may have been the system used to disguise the transfer of resources of the group to the bribe apprehended by the Federal Police with which the criminal group pestered the federal policemen that investigated the case;
- 7) Money laundering: Between August, 2006 and 2007, Braz, Yu and Amaral set up another money laundering scheme, involving two offshore companies and the front company MB2 Consultoria Empresarial. © NoticiasFinancieras - © GDA- Agencia Globo - All rights reserved

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